United States Government M E M O R A N D U M

DATE:

September 5, 2001

FROM:

Thomas E. Felasco

U.S. Probation Officer

SUBJECT: Request for Continuance

U.S. vs. Julius Bruce Chiusano Docket No. 00-6309-CR-SEITZ

TO:

The Honorable Patricia A. Seitz

U.S. District Judge

This memorandum is to request a continuance for the sentencing hearing scheduled in the above matter. Mr. Chiusano is currently scheduled to be sentenced on October 9, 2001. The offense in this case is rather complex in nature, and the probation officer assigned to complete The Offense Conduct section of the report is awaiting additional information from the prosecutors to complete that section. The offense level and guideline calculations cannot be determined without the information lacking from the government. In addition, according to the defendant's attorney, Donald Spadaro, the defendant is scheduled to enter a guilty plea to money laundering charges in another Indictment issued in the Southern District of Florida. That particular case is being heard by U.S. District Judge Paul C. Huck.

Based on the above, the probation officer respectfully requests a continuance on the sentencing of Julius Bruce Chiusano of at least four weeks to be able to complete the presentence investigation and allow the attorneys sufficient time to submit objections, if necessary.

Thank you for your consideration in this matter.

Respectfully submitted,

New sentencing date

Continuance denied _____